

“Serving Our Commonwealth”



Emergency Response Planning for EHS Facilities Course

Module 3



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Unit 1: Course Overview





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Course Purpose

This course is designed to provide active LEPC members an understanding of the legal planning requirements found in EPCRA, KRS, and KAR.

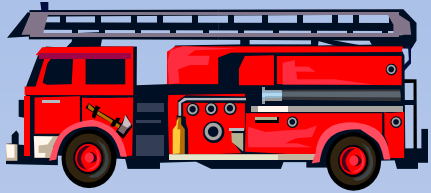


The roots of education are bitter, but the fruit is sweet.

- Aristotle



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Target Audience?

The target audience for this course are members of the LEPCs who participate in the EHS Facility Emergency Response planning process.



Who can / should be involved in the LEPC Planning Process?





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Course Design

This course is comprised of the following:

Unit 1: Course Overview

Unit 2: Planning Provisions of EPCRA, KRS, & KAR

Unit 3: Plan Section Requirements

Unit 4: LEPC Calendar and Plan Submission Process

Unit 5: LEPC Forms

Final Exam





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Course Logistics

**Please sign in
and
provide an email
address.**

Housekeeping
Issues:

- Breaks
- Cell Phones on Vibrate
- Location of Restrooms
- Location of Exits
- Other Concerns





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Class Expectations



Participate

Ask
Questions

Respect
Other's
Opinions

Return on
Time From
Breaks



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Introductions

INSTRUCTOR	STUDENT
Name	Name
Title	LEPC Name (County)
Organization	Personal or professional interest in LEPC.
Professional Experience	Importance of LEPC

You can't base your life on other people's expectations. - Stevie Wonder



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Acronyms

As you can see, part of learning about LEPCs is becoming familiar with a number of acronyms, some of the more common acronyms are:

EPCRA	Emergency Planning and Community Right to Know Act
LEPC	Local Emergency Planning Committee
LOL	List of Lists
SARA	Superfund Amendment and Reauthorization Act



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The TAB Q-7 Plan...

In Kentucky HAZMAT plans required by EPCRA were commonly known as the TAB Q-7; they were originally found in appendix Q of the County EOP. Annex Q-7 was for facility emergency response and SARA Title III plans. Hence, the name TAB Q-7.

Moving forward Kentucky will now refer to these plans as an EHS Facility Emergency Response Plan, or EHS Facility Plan for short.



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EHS Facility Plan Naming Protocol

EHS Facility Emergency Response Plan should be identified with a six digit number. Three digits (KY County Code) , a dash (-), and three digits (plan number).

For Example:

ADAIR 001

JEFFERSON 056

WOODFORD 120



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Unit 2: Planning Provisions of EPCRA, KRS, & KAR



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2016

Kentucky Emergency
Response Commission
(KERC)

Kentucky Emergency
Management (KYEM)



EMERGENCY RESPONSE PLANNING GUIDE FOR EHS FACILITIES: SELF-STUDY MANUAL

This manual is designed to provide readers with an understanding of the federal (EPCRA) and state (KRS and KAR) requirements for Hazardous Materials (HAZMAT) emergency response plans (formerly known in Kentucky as TAB Q-7s). This guidance supersedes all previous instructions for development of EHS Facility plans. This document provides instructions for completion of each section of the plan. All NEW or REVISED EHS Facility Emergency Response Plans must meet these criteria.

KERC Document: 730-PGSS

The KERC annually publishes an Emergency Response Planning Guide for EHS Facilities and offers a specific training course that reviews each required section.

EHS Facility Plan requirements are listed in full in EPCRA Section 303 and KAR 1.081.



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EPCRA = SARA Title III





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Section 301: Coordinator of Information

LEPCs shall establish rules for public notification of meetings to discuss the emergency plan and distribution of the emergency plan.

The LEPC shall establish procedures for designation of an official to serve as coordinator for information.



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Section 302: General

Requires EPA to create a list of Extremely Hazardous Substances (EHS) and establishment of a Threshold Planning Quantity (TPQ) for the EHSs.

SERC may designate additional facilities which shall be subject to the requirements of EPCRA.



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Section 302: Facility Requirements

Applicable to any facility that has an Extremely Hazardous Substance (EHS), present at any time, at or above its Threshold Planning Quantity (TPQ).

One-time notification to SERC and LEPC if any EHS is present in an amount \geq TPQ

Within 60 days after facility becomes subject to requirements or acquiring new EHS's (Echoed in KRS 39E.120)



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Section 303: LEPC Planning

- Require LEPCs to prepare chemical emergency response plans for all facilities with an EHS chemical above TPQ.
- Contains nine (9) planning requirements
- Plans must be reviewed by the:
 - ✓ SERC
 - ✓ LEPC annually





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Section 303: Facility Planning Requirements

Time Frame:	30 Days	Promptly	Upon Request & Within 60 Days
Facility Action:	Identify a facility representative who will participate in the emergency planning process as a FERC. (Echoed in KRS 39E.130)	Inform LEPC of changes occurring at facility	Provide information necessary for developing a EHS Facility Plan (Echoed in KRS 39E.220)



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EPCRA Section 304: Emergency Notification

- EPCRA 304 and CERCLA 103 (Reporting Spills and Releases) ensure that all levels of government are notified of potential emergencies.
- Facilities must immediately report accidental releases of quantities greater than corresponding Reportable Quantities (RQs) to state and local officials.
- While there are less than 500 chemicals identified as EHSs, there are thousands of chemicals required to be reported under CERCLA. This greatly increases the likelihood and frequency of the SERC and LEPCs receiving release notifications.



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Notification Content: Initial and Follow-up

- Initial release notifications (verbal) are required immediately but should not delay an emergency response.
- Follow-up notifications must be written and are required as soon as practicable after a release.
- Release notification content requirements are fully outlined in EPCRA Section 304.

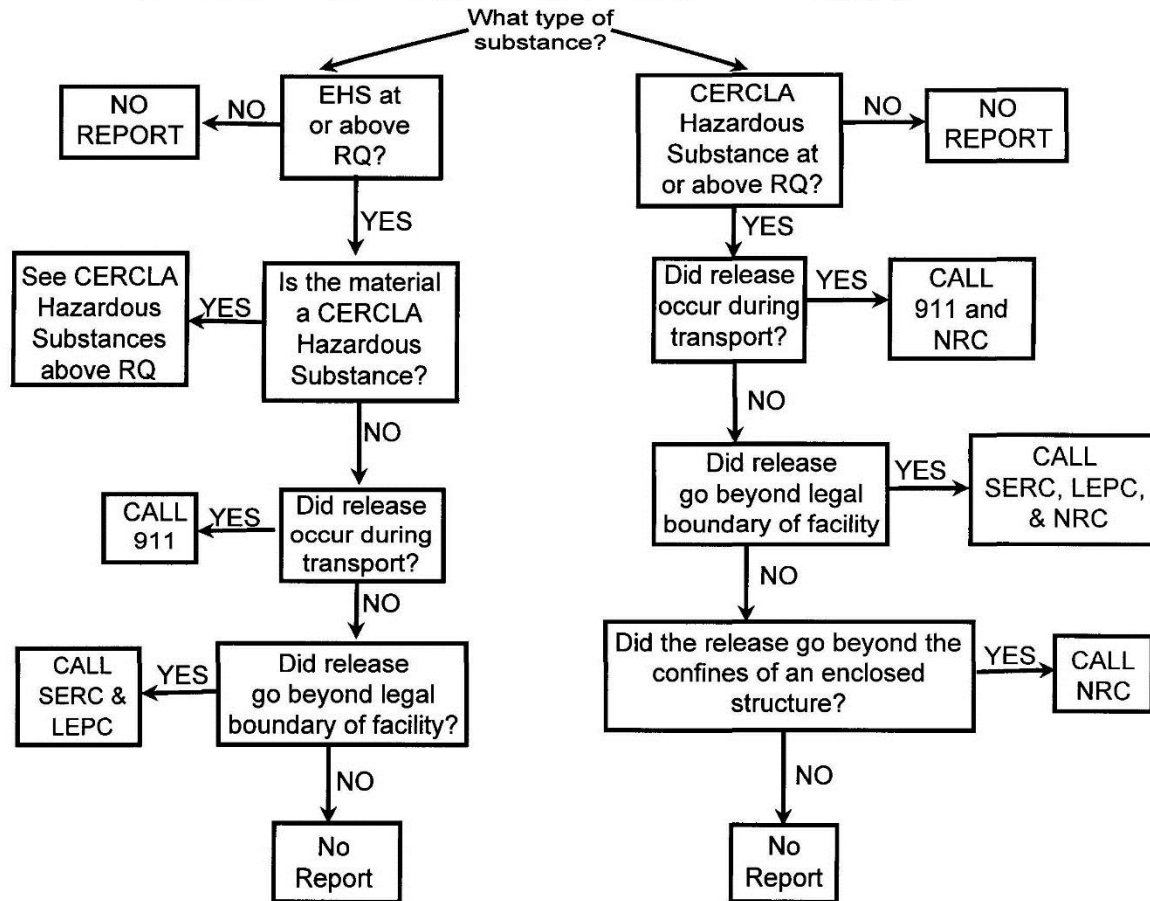




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Emergency Notifications, Reporting Decision Tree

CERCLA & EPCRA RELEASE REPORTING



If there is a release of a substance covered under Title III in a reportable quantity (RQ), the company/transporter shall immediately notify:

- Local and state warning points
- National Response Center (NRC)

Echoed in KRS 39E.190



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Section 312: Facility Requirements

Any facility required to have a SDS available under the Occupational Safety and Health Act of 1970 shall prepare and submit an hazardous chemical inventory form (Tier2 Report) to the following:

- ✓ The LEPC.
- ✓ The SERC.
- ✓ The local Fire Department



Much of the information included in EHS Facility Emergency Response Plans is found in the annual tier2 reports.



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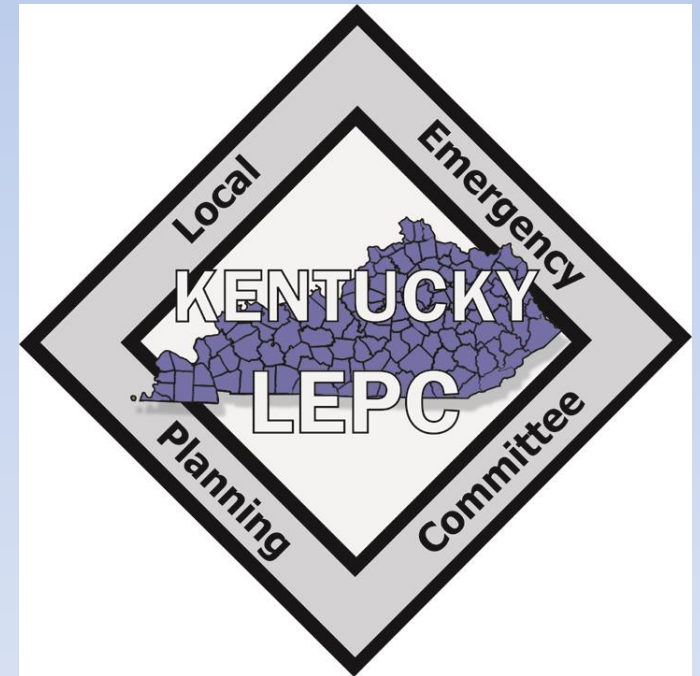
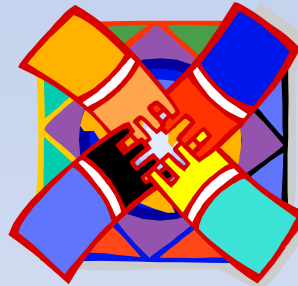
Section 324: Public Availability

Plans prepared under EPCRA Sections 302-303, 311-312 **must** be made available to the general public during normal working hours at the location or locations designated by the LEPC.



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EPCRA in KY = KRS 39E & 106 KAR





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39E.110 - LEPCs Duties

- Development and maintenance of EHS Facility Plans to prepare emergency response organizations to respond effectively to releases of hazardous substances
- Establishment of a method to:
 - Receive information from manufacturers, users, or storers of hazardous substances, and
 - Provide members of the public information about those substances
- Annual review of EHS Facility Plans



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39E.150 Plan Development, Approval, & Review

EHS Facility
plans shall
be approved
by the KEREC.

EHS Facility
plans shall
be a part of
the local
EOP.

LEPCs shall
annually
review
each plan.



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39E.140 Planning: Other

Local governments and school districts shall participate in the planning process conducted by the LEPC. This participation shall include, at a minimum:

- Providing information concerning government-owned or controlled emergency response assets;
- Reviewing plans developed by the LEPC; and
- Concurring that the final plan can be executed with existing resources.



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39E.160 Planning & Incident Response

Emergency response organizations shall respond in a manner consistent with all KERC approved plans developed by the LEPC.





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39E.990 Penalties

LEPCs may request the local fire chief make on-site inspections of any facility which has, or may have, HAZMAT substances.

LEPCs may, after consultation with the KERC chairman, seek civil remedies and with his consent submit information to the county attorney for prosecution.

Any person violating any provision of this chapter shall be guilty of a Class A misdemeanor. First conviction fines begin at two hundred and fifty dollars (\$250), some violations start at \$2,500. Each day upon which the offense is continued constitutes a separate offense.



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KAR 1.081 FACL

Each March 1 any facility that has an EHS in excess of the TPQ shall review the EHS Facility Emergency Response Plan and send a Facility Annual Certification Letter (FACL) to the LEPC stating that:

- There were no changes and therefore the plan is correct as is; or
- The plan has been revised and the revisions are included with the FACL.



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KAR 1.091 LEPC Planning Requirements

Requires the LEPC have an EHS Facility Emergency Response Plan as set out in the "Emergency Response Planning Guide for EHS Facilities" for each facility in the planning district that has an EHS in excess of the TPQ that has been approved by the KEREC.



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KAR 1.091 ACL and Plan Checklist

The LEPC must submit an EHS Facility Emergency Response Plan Checklist with all plans submitted for KEREC approval.

The LEPC shall submit new plans to the KYEM AM within sixty (60) days.

No later than April 1 each year, the LEPC must submit an ACL to the KYEM AM.



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KAR 1.121 Tier2 Funding Split

Eligible Counties split 50% of the total Tier2 revenue and each eligible county receives:

A 20% share
(Eligible County Portion)

= flat rate split

A 40% share
(Tier2 Portion)

= $\frac{\# \text{ Tier2s in county}}{\text{Total Tier2s in KY}}$

A 40% share equal
(EHS Plan Portion)

= $\frac{\# \text{ EHS Plans in county}}{\text{Total EHS Plans in KY}}$



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Unit 2: Fundamentals Review

- Where can you find a complete list of the EHSs?
- How long does a facility have to notify the LEPC of a new EHS?
- Who gets the LEPC facility information needed for an EHS Facility Plan?
- What is the facility deadline for submitting a Tier2 Report?
- Who is responsible for creating an EHS facility emergency plan
- How often must the EHS Facility plans be reviewed?
- Where do approved EHS Facility plans reside?
- Who besides facilities and the LEPC are required to participate in planning?
- Are local response agencies required to follow protocol in an EHS Facility plan?
- What is the deadline for submitting a FACL to the LEPC)?
- What document must be completed, signed, and attached to all EHS Facility Plans submitted for approval to the KERCC?
- How long do LEPCs have to create, review, and approve a new EHS Facility Emergency Response plan for submission to the KYEM AM?
- What is the deadline for submitting an ACL to the KYEM AM?



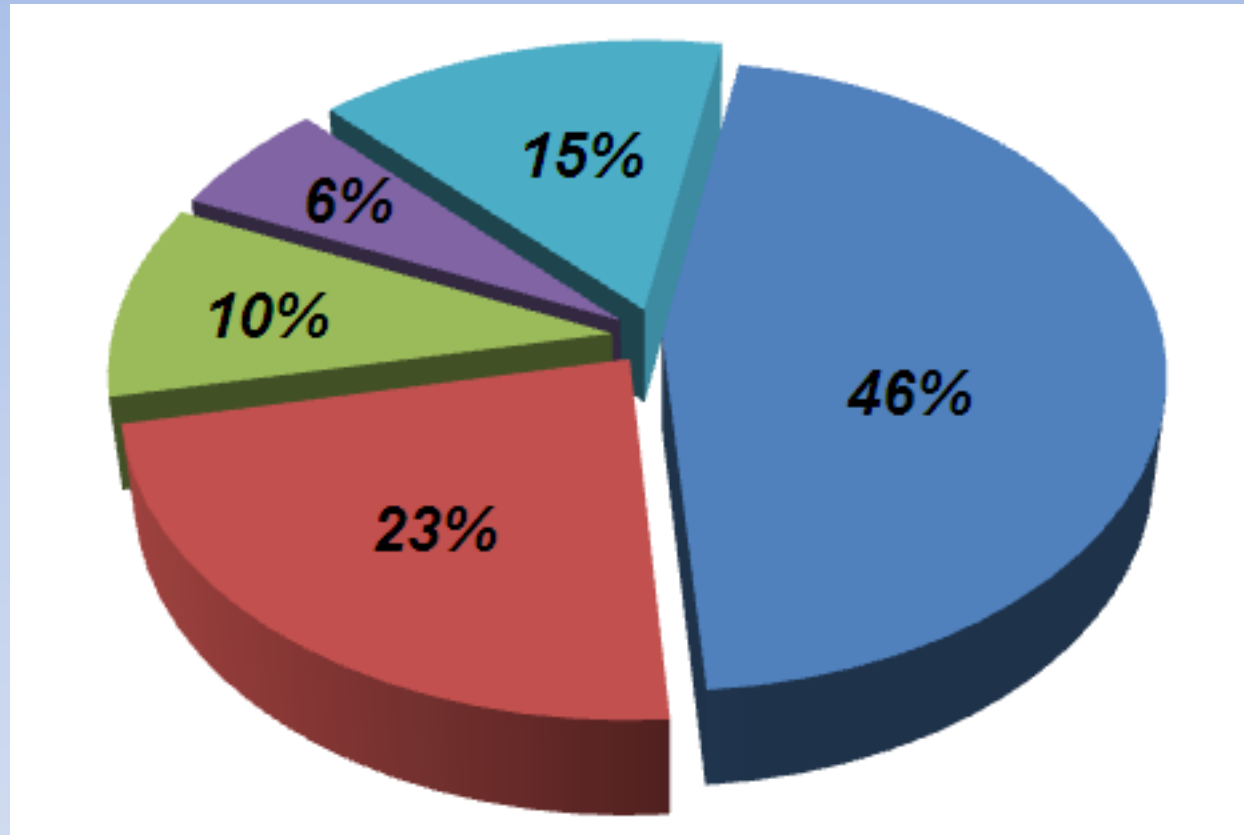
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Unit 2: Review Answers

- In the EPA's "List of Lists", on KYEM's SARA Title III web page, & at <http://www2.epa.gov/epcra/epcracerclacaa-ss112r-consolidated-list-lists-march-2015-version>
- 60 Days
- Facility Emergency Response Coordinator (FERC)
- March 1st
- LEPC
- Annually
- County SharePoint folder, EOP, & at the EHS Facility
- Local Government and School Districts
- Yes, it is clearly stated in KRS 39E.160
- March 1st
- EHS Facility Emergency Response Plan Checklist (KERF Form 303-PC)
- Sixty (60) days from the notification that the facility has an EHS
- April 1st



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Unit 3: EHS Facility Emergency Response Plan - Section Requirements



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*****Minimum Requirements*****

The following items are minimums that must be met in every EHS Facility Plan... if, in the eyes of the LEPC, a facility poses a threat that requires different or additional information it may and should be included!



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Federal Plan Requirements

EPCRA planning requirements consist of the following nine elements:

- (1) ID of facilities.
 - ID of transportation routes of EHSs.
 - ID of special facilities.
- (2) Methods and procedures for incident response to be followed by facility, emergency, and medical personnel.
- (3) Designation of a community emergency coordinator and facility emergency coordinators.
- (4) Procedures providing reliable, effective, and timely notification to persons designated in the plan, and to the public, that a release has occurred.
- (5) Methods for determining the occurrence of a release, and the area or population affected by such release.
- (6) A description of emergency equipment and facilities in the community and the facility
 - ID of the persons responsible for such equipment and facilities.
- (7) Evacuation plans, including precautionary and alternative.
- (8) Schedules for training of emergency response and medical personnel.
- (9) Exercise plan.



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State Plan Requirements

The KERC's planning requirements consist the following five elements:

- (1) Legible sketch of the facility including
 - directional arrow
 - location of EHSs
 - access road
- (2) Response point
 - Responsibilities of the FERC
- (3) Staging area and
 - alternative staging area(s)
- (4) List of EHS suppliers and telephone numbers
- (5) List of the special facilities within each quadrant of the VZ
 - Total populations of each quadrant



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Facility Name and Address

Federal Requirement

Facility Name and Address

List the complete facility name, street address. List the physical address, not the mailing address (if it is different), city, state, and zip.

Latitude / Longitude Coordinates

This is **mandated** effective January 1, 2014 on Tier2 Inventory Forms.



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FERC Contact Information

Federal Requirement

List **ALL** appropriate communication telephone numbers
 *one must be 24-hour access to the FERC and be labeled as such

Primary Facility Emergency Response Coordinator

Name:

Title:

Home

Office

Cell

24-Hour *

Email

Alternate Facility Emergency Response Coordinator

Name:

Title:

Home

Office

Cell

24-Hour *

Email



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EHS Chemical Information

Federal Requirement

NAME	List the chemical name. Listing the trade or common name of the chemical is optional.
UN ID#	The UN ID # is used for identification of chemicals during transportation and are recommended for inclusion in the plans.
CAS#	The CAS numbers are listed in SDS, various publications (such as the List of Lists), and in databases (such as CAMEO).
FORM	Found in Tier2 Report under Physical State (solid, liquid, or gas)



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Chemical Information cont.

Federal Requirement

PACKAGED CONTAINER	<ul style="list-style-type: none"> •Known as Storage Location Type in Tier2Submit •List size and type of container •Descriptions should match storage types in Tier2Submit 								
	Above Ground Tank	Bag	Battery	Below Ground Tank	Box	Can	Carboy	Cylinder	Fiber Drum
	Glass Bottles or Jugs	Plastic Bottles or Jugs	Plastic or Non-metallic Drum	Rail Car	Silo	Steel Drum	Tank Inside Building	Tank Wagon	Tote Bin
MAXIMUM QUANTITY	<ul style="list-style-type: none"> •Known as Max Daily Amount in Tier2Submit •List the maximum quantity at the facility at any one time •Must be expressed in pounds 								



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Chemical Health Hazard

Provide a brief health risk description. A variety of responses and sources are acceptable if they accurately convey the health hazard or risk.

Terms such as asphyxiate, oxidizer, poisonous, infectious, corrosive, etc. may be used.

Use Health Hazard Summaries from:

- **The NFPA 704 Marking System 0 - 4**
- **Safety Data Sheet (SDS)**
- **Emergency Response Guidebook**
- **CAMEO**

Acute or chronic are NOT acceptable



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Sketch of Facility & Storage Areas

Kentucky Requirement

1) Must be legible and include the layout of buildings and equipment.

2) Must contain a north directional arrow



The sketch does not have to be drawn to scale. An engineering may be used, however, a simple hand-drawn sketch is usually best.



3) Must identify the location of each EHS

4) Must show the access road to include the name of the road





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Facility Response Point (RP)

Kentucky Requirement

The facility Response Point (RP) is the place where the FERC will meet off-site response personnel. Directions to the RP from the facility must be included.

Note: Include the following statement in this section.

"The facility representative who meets off-site response personnel at the RP should have a copy of the EHS Facility Emergency Response Plan, the facility Contingency Plan (if required), appropriate SDSs, and should be prepared to brief the responders on the current situation."



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Staging Area

Kentucky Requirement



Where support vehicles, equipment, and personnel will report and await assignment by the incident commander. Located beyond the potential vulnerable zone.

Select an alternate site in case the primary location proves impractical.



DO NOT select the facility parking lot, generally it will be too close to the point of release.



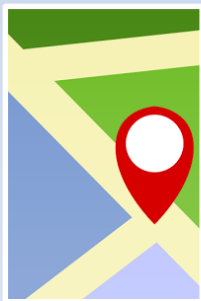
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Transportation Modes & Routes

Federal Requirement



List the primary transportation routes and modes of transportation from the county line to the facility (and from the facility out of the county) for all EHSs received and shipped by the facility.



List hazardous points along the routes.





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EHS Supplier Information

For each EHS supplier, include:

- Company Name
- POC Information
- Address
- Telephone Number





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Worst Credible Release



If a facility has several tanks filled with a chemical, but the tanks are not interconnected, the worst credible release should be based on the largest single tank. However, if two or more of the tanks are interconnected, the worst credible release should be based on the release of all the chemical tanks.

If chemicals are stored on pallets in a farm store and a fork lift causes an accident it is not logical to assume only one container in a large palletized section would be spilled.

In the event of fire, all chemicals in a facility could be released, resulting in hazards downwind at greater distances than for accidents involving only airborne releases.





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Vulnerable Zone

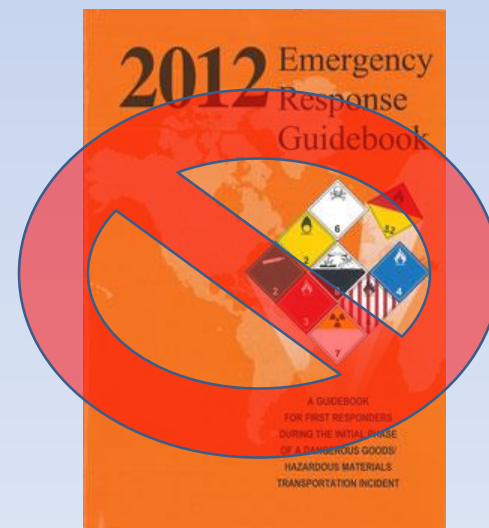
The Vulnerable Zone (VZ) is the potentially impacted geographic area that would be affected, based on the worst credible release, in the event of a chemical incident at a facility.

This section of the plan must include information on the type and quantity of chemical and other parameters used to determine the radius and the method with which the radius of the VZ was determined.

Radii are used to determine the area (VZ) around the facility which may be affected by the release of a chemical. Radii are based upon the airborne release of EHS gases or vaporized liquids or solids from the worst credible accident.

The plan must state the radius of the vulnerable zone and how the radius was selected. Acceptable methods include using:

- Technical Guidance for Hazards Analysis (Green Book)
- CAMEO
- other approved modeling system.



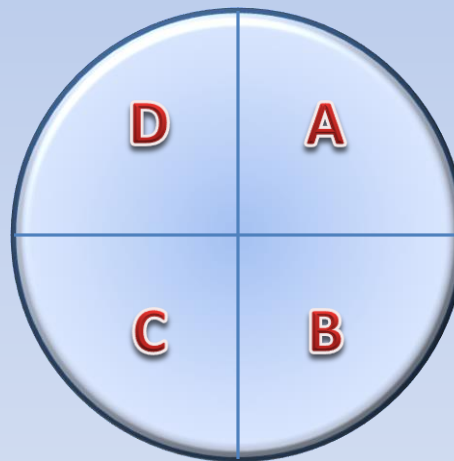


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Quadrant Map

1. Using a city or county map with a suitable scale, draw a circle centered around the facility depicting the vulnerable zone.

3. Begin at the north axis and move in a clockwise direction, designate the quadrants A through D.



2. Divide the circle into four quadrants by drawing lines on the north-south and the east-west axis.

4. Estimate the population of each quadrant



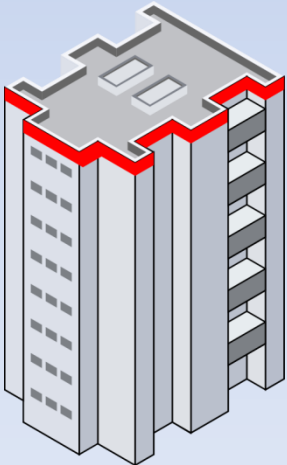
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Special Facilities List

Federal Requirement

Affected special facilities shall be notified and assistance provided because of their proximity to the incident or the effects the incident will have on them. No hard-and-fast rule for selection of special facilities can be given, as it should be based on the Vulnerable Zone (VZ).

List all Special Facilities located within each quadrant.





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Quadrant Total Population

1. List the TOTAL population for each quadrant: the facility population PLUS the resident population PLUS the special facilities population, PLUS business and transient populations.
2. If the population increases significantly because of ball games, concerts, or special events, this should be noted.



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Quadrant Map / Special Facilities

Example

Quadrant A: The total pop. of quadrant A is 7500.

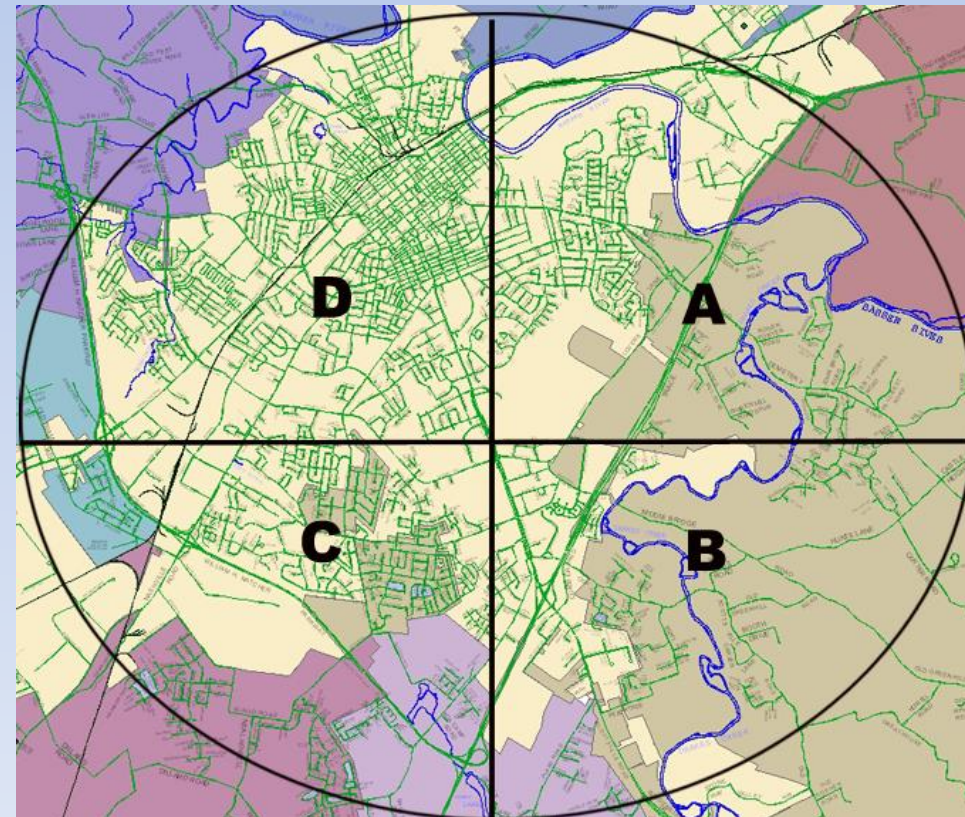
1. Mildred Smith Middle School 606-276-1234
2. City Hospital 606-276-3761
3. Morningside Nursing Home (175) 606-276-9805

Quadrant B: The total pop. of quadrant B is 895

1. Coca Cola Bottling Plant (210) 606-276-9955
2. Green Truck Plant 606-276-5555

Quadrant C: The total pop. of quadrant C is 780
No Special Facilities

Quadrant D: The total pop. of quadrant D is 350
No Special Facilities





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Protective Actions

Federal Requirement



- Shelter-In-Place (SIP) or Evacuation
- Who determines protective actions
- Describe all systems or procedures used to warn the public
- How will the public will be contacted
- ID the agencies performing these tasks.
- Who determines when protective measures can cease



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Shelter-In-Place (SIP)



Shelter-in-Place is a short-term protection.

- Applicable for releases of short duration (30 min or less)
- SIP for no more than a few hours

The average rate for air change per hour (acph) in "average" American homes and office-type buildings under average conditions is 0.8 to 1.0 acph with doors and windows closed and ventilation systems closed down.

"Leaky" buildings or average buildings exposed to severe weather conditions, with air change rates of 1.5 to 2.5 acph, may experience 45 to 65 percent of outdoor concentrations in 30 minutes.

Include EXIT SIP information:

- Ventilate the building,
- Go outside, or
- Evacuate





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Evacuation

If evacuation will be considered:

- Briefly describe the situation that would prompt an order to evacuate.
- Give general procedures and routes used for evacuations.
 - Note if only one road is available for evacuation
 - If several routes are available, ID how routes will be selected

Identify officials who will authorize reentry of an evacuated area, provide general:

- criteria for determining when reentry can begin
- procedures for reentry.



Planners may reference existing evacuation plans for additional details on how evacuations will be carried out.





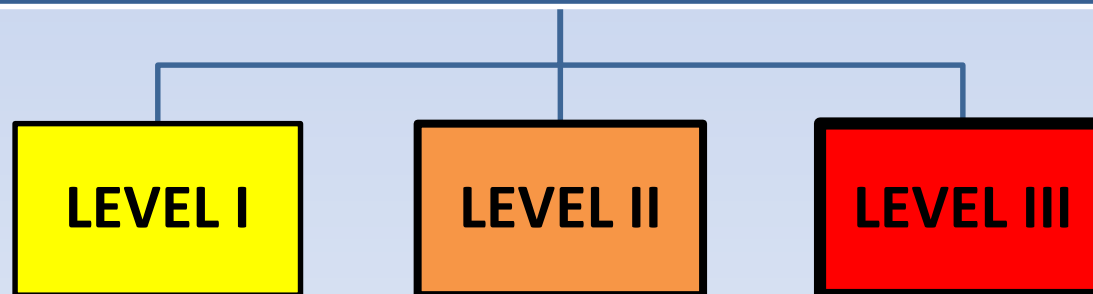
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Response Levels

Designation of Response Levels is optional for each community.

Response Levels may be used to indicate the complexity of the incident, the number of responding organizations, the size of the affected area, and the severity of the hazard.

Response Levels are classified as Level I, Level II, or Level III.





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Response Levels

Level I - Emergency

- Controlled by local first response agencies
- Does not require evacuation other than the involved structure or the immediate outdoor area.
- Does not pose an immediate threat to life or property.
- Contact:
 - Fire Dept.
 - EMS
 - Police
 - Partial EOC Staff
 - PIO
 - CHEMTREC
 - NRC

Level II – Limited Emergency

- Poses a potential threat to life or property
- May require limited evacuation of the surrounding area.
- Contact:
 - All agencies in Level I
 - HAZMAT Teams
 - Full EOC Staff
 - Public Works Dept.
 - Health Dept.
 - Red Cross
 - County DES/EMA
 - State Police
 - Public Utilities

Level III – Full Emergency

- Poses an extreme threat to life and property
- Probably requires a large scale evacuation
- Requires expertise or resources of county, state, federal, or private agencies/organizations.
- Contact, as needed:
 - All agencies in Level I and II
 - Mutual Aid Agencies
 - EEC
 - HSC
 - FCC
 - USEPA
 - USCG
 - ATSDR
 - FEMA
 - OSC/PRT



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EQUIPMENT ON HAND/TRAINING/EXERCISING must be discussed from the perspective of both the facility and the community.

Federal Requirement

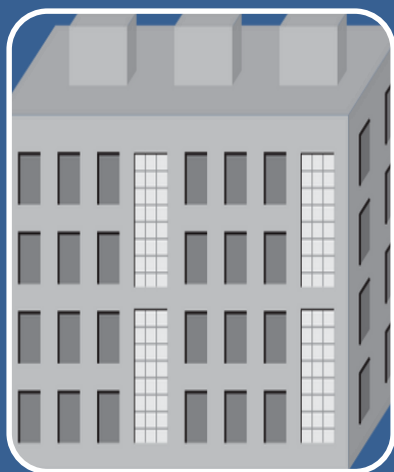
Planners may choose to discuss all three items from the facility's perspective and then repeat the discussions from the community's standpoint.

Planners may choose to discuss each item individually cumulatively in single paragraphs where both the facility and community capability is cumulatively detailed.



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Equipment on Hand



Facility Equipment

- List of equipment available at the facility, for example
 - Simple items - detection devices (monitors), brooms, shovels, and trash cans
 - Sophisticated items - protective clothing and equipment
 - List any respirators or SCBAs on-site or available to on-site personnel
- List any alarms which may signal a release
- List facility containment options to retard the escape of the chemical, provide:
 - Description of the area
 - Steps to be taken to retard the escape
- List any on-site facility EMS unit or fire department



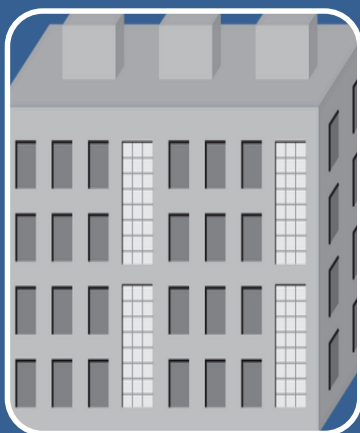
Community Equipment

- List equipment available to the community emergency response personnel.
- An Emergency Resource Inventory List (ERIL) may be referenced.



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Training



Facility Response Training

- Describe facility training program.
- Describe training employees receive when initially assigned to a position.
- Describe refresher training programs including frequency.
- Describe who provides training.
- Local training programs should include response procedures for releases from facilities in the community.



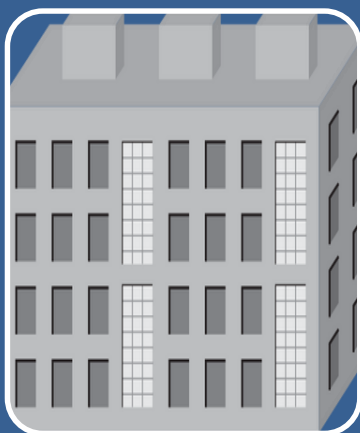
Community Response Training

- Response agencies are subject to KY Dept.. of Labor Cabinet training requirements.
- Response agencies are responsible for assuring personnel receive adequate/appropriate HAZMAT training.
- Organizations should maintain records of completed training and refresher courses.
- List the level of training for response personnel.
- List specialized / advanced training and its source.



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Exercise Program



Facility Exercise Program

- Provide a description of, and schedule for, the facility exercise program.
- If the facility has an exercise program list the frequency, type of activity, participants, and other pertinent information.
- If they do not have an exercise program, include a statement that the facility will participate in hazardous materials exercises when requested by local officials.



Community Exercise Program

The community must conduct exercises in compliance with State guidance if receiving state or federal financial assistance. The community must meet at minimum:

- Exercises conducted on a four-year cycle.
- Full-scale exercise must be conducted at minimum once per cycle.
- Communities may choose the type of exercise and the scenario.
- Local officials are encouraged to include HAZMAT exercise scenarios.



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Medical Capabilities

Community Medical Capabilities

- Local medical personnel should be aware of the chemicals used in the community.
- Provide a statement of the capability of local or area medical facilities to decontaminate and care for patients exposed to chemicals.
- If local facilities are unable to care for patients, discuss provisions for providing medical care to injured persons and list medical facilities to which patients will be taken.
- If medical facilities or other Special Facilities are forced to evacuate, discuss provisions for relocating medical personnel and patients.





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Spill: Containment / Clean-up / Disposal

Federal Requirement



- Facilities are encouraged to list clean-up contractors who may be employed to assist with containment, clean-up, and disposal
- If clean-up and disposal require compliance with EEC regulations include a statement to the affect that these regulations will be followed.

Containment



- Describe any procedures/systems in place to minimize the loss of chemicals during an unplanned release.
- If the chemicals vaporize immediately when released and containment is not possible, please note.

Clean-Up

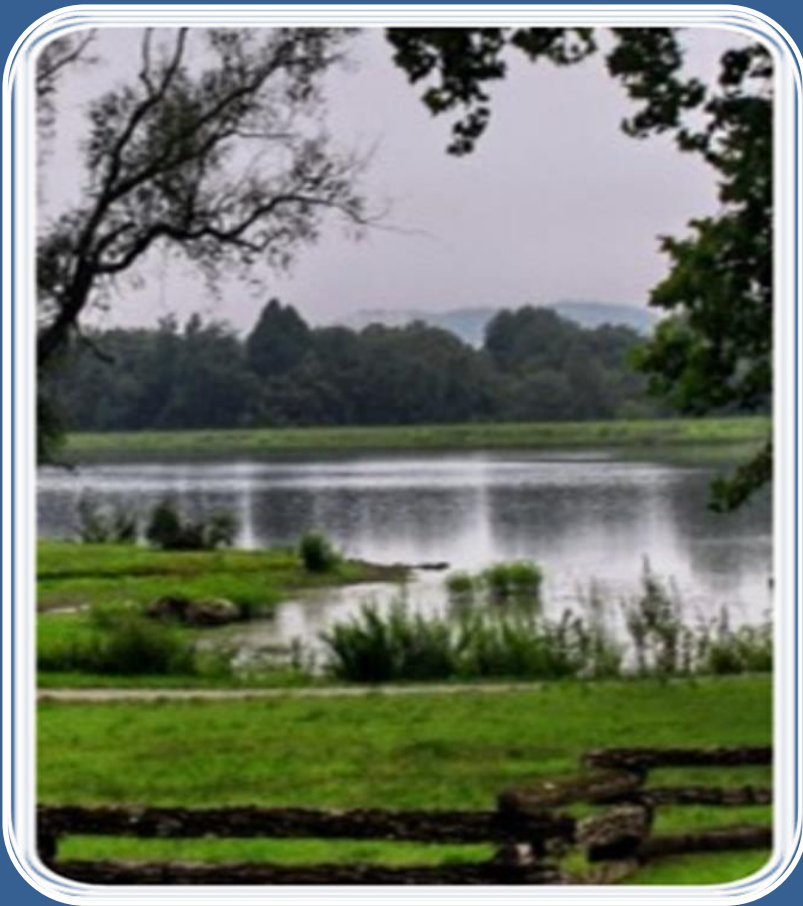


- Describe general procedures for clean-up of released chemicals
- External agencies may be sought for advice/guidance, or a contractor may be employed to clean-up the chemicals.



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Disposal



The facility and local emergency response personnel are required to develop procedures which must be approved by the EEC prior to implementation of the plan.

- Do NOT state they will be disposed of in accordance with EEC or USEPA regulations unless details of the regulations are provided.
- Describe how recovered materials will be disposed.
- If the facility has procedures in place for disposal, describe them.



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Emergency Notification

Kentucky Requirement

The EHS Facility Plan template contains an Emergency Notification section as a guide and lists a number of agencies which are usually involved in a hazardous materials release. It is not an all-inclusive list of contacts, LEPCs should add any appropriate telephone numbers within the jurisdiction.

Note:

- The HazMat Coordinator listed in the Emergency Notification Section of the EHS Facility Plan is the COMMUNITY HAZMAT Coordinator.
- If the vulnerable zone extends into an adjacent county or state, notification numbers for those jurisdictions must be included.



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Emergency Notification List

Agency	Telephone Number
Local 24-hour Warning Number (LEPC)	
Community HAZMAT Coordinator	
Alternate HAZMAT Coordinator	
Local EM Director	
KyEM Area Manager	
Local Fire Department	
Local Police Department	
Local Rescue Squad	
Local Ambulance	
LEPC Chair	
Kentucky Emergency Response Commission (KERC)	(502) 607-1682
Natural Resources Environmental & Public Protection Cabinet	(502) 564-2380 or 1-800-928-2380 24-Hour Hotline
National Response Center (NRC)	1-800-424-8802
US Environmental Protection Agency (EPA)	1-800-424-9346 Hotline
State Fire Marshall	(502) 573-0382
State 24-Hour Warning Point for HAZMAT Spill Notification	1-800-255-2587
Chemtrec	1-800-424-9300
Kentucky State Police	(502) 782-1800



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Unit 3: Fundamentals Review

- ☐ Which EHS Chemical Characteristics are required to be included in the EHS Facility Plan?
- ☐ What must a facility sketch include?
- ☐ What may be used to determine the radius of the vulnerable zone?
- ☐ How is a quadrant map labeled?
- ☐ What is considered a Special Facilities?
- ☐ Are directions for SIP & Exit SIP required in plans?
- ☐ What content is required to be included with evacuation directions?



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Unit 3: Review Answers

- Name, CAS #, Form, Package Container, Maximum Quantity, & Health Hazard
- A facility sketch must be legible and contain a north directional arrow, the name of the access road, and the location of each EHS.
- CAMEO, the Green Book, or other appropriate modeling system, but not the ERG
- Center the map on the facility and divide the circle into four quadrants with lines on the north-south and the east-west axes. Beginning at the north axis and moving in a clockwise direction, designate the quadrants A through D.
- School, Day Care, Nursing Home, Hospital, and others.
- Shelter-in-Place is a short-term protection; plans should include directions for Exit SIP
- Plans must identify the officials who authorize reentry, criteria for determining when reentry can begin, and general procedures for reentry



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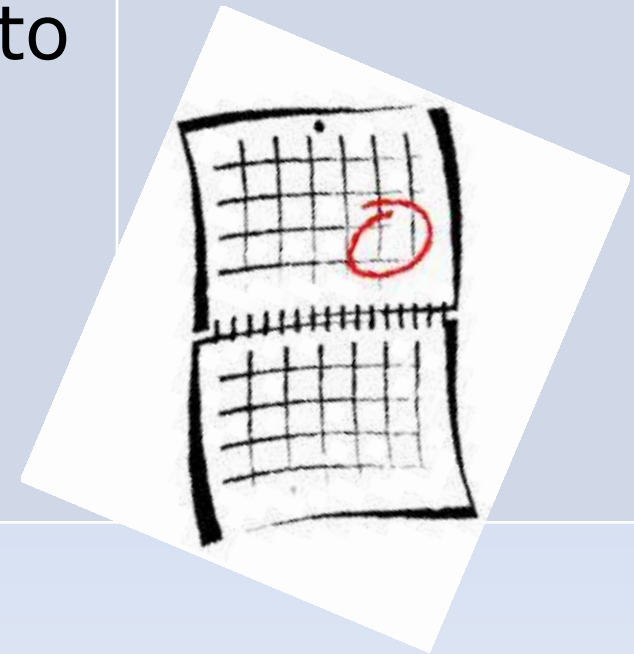
Unit 4: LEPC Calendar and Plan Submission Process



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LEPC Planning Calendar Highlights

March 1 st	April 1 st	September 15 th
<p>Facilities Submit:</p> <ul style="list-style-type: none">•Tier2 Inventory Forms to SERC, LEPCs, FDs•Facility Annual Certification Letter (FACL) to the LEPC	<p>LEPCs Submit:</p> <p>Annual Certification Letter (ACL) to the KYEM AM</p>	<p>KERC: makes grant award payments.</p>





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Eight (8) Approved ACL Plan Status Definitions

NEW – *

TECHNICAL CHANGE – *

UNDER DEVELOPMENT – **

ADMINISTRATIVE CHANGE –

NO CHANGE –

DELETED –

RESERVED FOR FUTURE USE –

NO EHS –

***Require submission to the KERC for approval**

**** Require submission for approval w/in 60 days**



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Administrative vs. Technical

Administrative changes:

do not materially affect response operations e.g.,

- ☐ Facility name change
- ☐ Phone number change
- ☐ Personnel changes

Technical changes * :

materially affect response operations e.g.,

- ☐ the type of EHS chemical
- ☐ the quantity of EHS chemical
- ☐ Change in the radius of the VZ

***Require submission to the KERC for approval**



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New vs. Under Development

* NEW –

- ☐ Complete
- ☐ Has been reviewed and approved by the LEPC
- ☐ Has NOT been reviewed or approved by a KYEM AM or the KERC.

*Require submission to the KERC for approval

** Require submission for approval w/in 60 days

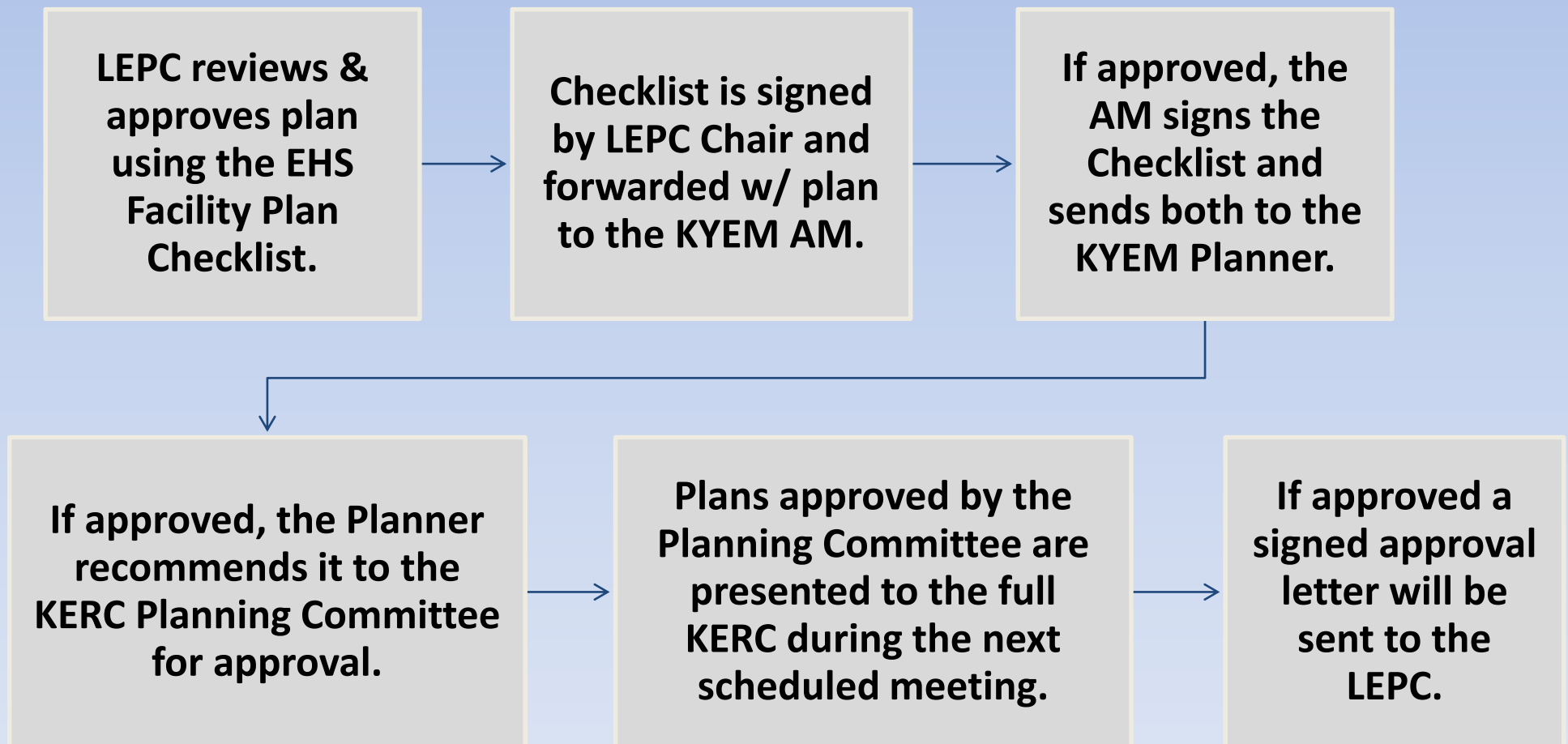
** UNDER DEVELOPMENT –

- ☐ Complete -or- Not complete
- ☐ Has NOT been reviewed and approved by the LEPC
- ☐ Has NOT been reviewed or approved by KYEM AM or KERC.
- ☐ 106 KAR 1:091 requires LEPCs submit EHS Facility Plans to the KYEM AM within sixty (60) days of notification that the facility has an EHS.



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EHS Facility Plan Submission Process





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Posting Plans to SharePoint

At the July 29th, 2015 meeting, the KERC voted to approve a policy requiring LEPCs to post all approved EHS Facility Emergency Response Plans to their respective County SharePoint folder. Plans that have been officially approved by the KERC must include:

- County Title III Plans Checklist signed by the:
 - LEPC Chair,
 - KYEM Area Manager, and
 - KERC Commissioner
- An official approval letter signed by the Chairperson of the KERC.

If any plan is missing either of these documents it should be consider non-approved and the LEPC should complete the review process and submit the LEPC approved plan, with checklist, to the KYEM Area Manager within 60 days.



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Plan Posting Notification

- 1) LEPC representative uploads documentation to County SharePoint Folder
- 2) LEPC representative emails KYEM AM and LEPC Program coordinator

Email must include specifically:

- a) which document was uploaded (xxxx)
- b) where document is located (xxxx)



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KERC Approved Plan Storage

Approved plans should be maintained in several locations, including but not limited to:

- in LEPC office
- at the facility
- at the fire department
- In the County EOP
- in the County SharePoint folder



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Approved Plan Distribution

Every individual and entity named in the EHS Facility plan should have access to the plan.

Every individual and entity the plan dictates will take action should have access to the plan.

This includes, but is not limited to:

- Facility personnel, including the FERC
- Local EM
- Special facilities
- First responders
- Local elected officials



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Unit 4: Fundamentals Review

- ☐ Which plan status' requires the plan be submitted to the KERC for approval?
- ☐ Which plan status identifies a plan that has not yet been completed by the LEPC, but will be submitted for approval within 60 days?
- ☐ Where do approved EHS Facility plans reside?



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Unit 4: Review Answers

- TECHNICAL CHANGE
- UNDER DEVELOPMENT
- County SharePoint folder, County Emergency Operations Plan (EOP), and at the EHS Facility



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Unit 5: LEPC Forms

ALL forms and manuals are posted at the following:

KYEM Website – KERC, LEPC, & SARA Title III webpages

KYEM External SharePoint - KYEM Forms



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EHS Facility Plan # -_xxx_ (COVERED FACILITY NAME)

FACILITY NAME	FACILITY EMERGENCY COORDINATOR (FEC)	COMMUNICATIONS			
(Facility Name)	Name:	Office#			
(Street Address)	Title:	FAX #			
		Home #			
(City, State & Zip)		R.Freq.			
		Cell #			
(Latitude / Longitude)		Pager #			
		Email			
	ALTERNATE FACILITY COORDINATOR (FEC)				
	Name:	Office #			
	Title:	FAX #			
		Home #			
		R.Freq.			
		Cell #			
		Pager #			
		Email			
HAZARDOUS CHEMICAL(S)					
NAME	UN ID # CAS #	FORM	PACKAGED CONTAINER	MAXIMUM QUANTITY	HEALTH HAZARD

SKETCH OF FACILITY AND STORAGE AREAS:

FACILITY RESPONSE POINT (RP) AND DIRECTIONS – Alternate RP:

STAGING AREA – Alternate Staging Area:

TRANSPORTATION ROUTES AND MODES OF TRANSPORTATION:

EHS SUPPLIER INFORMATION

WORST CREDIBLE RELEASE:

VULNERABLE ZONE & QUADRANT MAP:

SPECIAL FACILITIES, CONTACT INFORMATION, & TOTAL POPULATION:

PROTECTIVE ACTIONS: (SIP/EXIT SIP AND/OR EVACUATION/RE-ENTRY)

EHS Facility Plan Template KERC Form 301-PT Page 1



“Serving Our Commonwealth”

EMERGENCY EQUIPMENT ON-HAND/TRAINING/EXERCISING:

MEDICAL CAPABILITIES:

SPILL CONTAINMENT / CLEAN-UP / DISPOSAL:

EMERGENCY NOTIFICATION:

EMERGENCY NOTIFICATION LIST TEMPLATE				
Local 24-hr. Warning Number (LEPC)			-	-
State 24-hour warning point for HAZMAT Spill Notification			1-800-255-2587	
Local Emergency Planning Committee Chair	-	-	or	-
Kentucky Emergency Response Commission (KERC)			502-607-1682	
Community HAZMAT Coordinator (Day)	-	-	or	-
(Night)	-	-	or	-
Alternate HAZMAT Coordinator (Day)	-	-	or	-
(Night)	-	-	or	-
		Local Fire Dept.		-
		Local Police Dept.		-
Local EM Director (Day)	-	-	or	-
(Night)	-	-	or	-
	Rescue	-	or	-
	Ambulance	-	or	-
KYEM Area Manager (AM)			(O)	-
			(H)	-
Kentucky Department for Environmental Protection (KY-DEP)			502-564-2380	
24 Hour Hotline			1-800-928-2380	
National Response Center (NRC)			1-800-424-8802	
U. S. Environmental Protection Agency (EPA) Hotline			1-800-424-9346	
10:00 a.m. – 3:00 p.m. EST, Mon. – Thurs.				
State Fire Marshal			502-573-0382	
CHEMTREC			1-800-424-9300	
Kentucky State Police			502-782-1800	
ALL Special Facilities Located within the Vulnerable Zone				

Note: There are two tables in this document. To make document visually more aesthetic you may hide individual cell lines: hover mouse over small directional arrows at the top left-hand corner of each table, right click, select "borders and shading, select all, and click OK.

EHS Facility Plan Template KERC Form 301-PT Page 2



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LEPC Annual Certification Letter (ACL)



Due Date: No later than April 1st each year, the LEPC shall review all EHS Facility Emergency Response plans and submit an Annual Certification Letter (ACL) to the KYEM AM stating that there were no changes and therefore the plan is correct as is; or the plan has been revised and the revisions are included with the ACL.

County: _____

KYEM Region: _____

Our Local Emergency Planning Committee (LEPC) has reviewed all existing EHS Facility Emergency Response Plans (TAB Q-7's). Based on this review, which includes information that was received from covered facilities by March 1, for the previous calendar year, the LEPC has created new and/or finds changes (have or have not) occurred to the content of these EHS Facility Emergency Response Plans since last submitting an ACL. Enclosed with this ACL are the new or revised EHS Facility Emergency Response Plans, with their required EHS Facility Plan Checklists.

The following is a complete listing of all EHS Facility Plans that have been reviewed by the LEPC as of April 1 and a designation of their current status:

		SEE INSTRUCTIONS	Y/N/NA	Y/N/NA	mm/dd/yyyy
Plan Number	Facility Name	Status	Share Point	Check List	KERC Approval Date
051-001	Windstream Columbia				
051-002	Bluegrass Cellular: 556 C. Long Road				
051-003	Bluegrass Cellular: 7880 Edmonton Rd				
051-004	Southern States Adair Branch				
051-005	Warner Fertilizer Co, Inc.				

5 Total number of current Ehs Facility Plans in my County.

LEPC's must submit with their ACL a complete plan, highlighting revisions, along with a EHS Facility Plan Checklist for all plans with status listed as: "New" or "Technical Change".

LEPC's must submit a complete plan along with a Ehs Facility Plan Checklist for all plans with status listed as "Under Development" within 60 days of notification that the facility has an EHS in excess of the TPQ.

Certification: I, the undersigned, certify to the Kentucky Emergency Response Commission (KERC) that all the information is true and accurate.

Chair
Local Emergency Planning Committee

Signature _____
Date: _____

Sample

Annual
Certification
Letter (ACL)
KERC Form 302-
ACL



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LEPC - EHS Facility Emergency Response Plan CHECKLIST

FACILITY	Plan #	LEPC		AM		KERC	
		Y	N	Y	N	Y	N
ADMINISTRATIVE INFORMATION							
Section 1: General							
1. Are the page numbers in the footer?							
Section 2: Sketch / Facility Map							
1. Is a sketch of the facility and storage areas included?							
2. Is sketch of the facility and storage areas legible?							
3. Does sketch show directional arrow?							
4. Does sketch show location of all EHSs?							
5. Does sketch show facility access road?							
Section 3: Response Point / Staging Area and Alternatives							
1. Is the facility response point (RP) identified, including directions to area?							
2. Is the staging area identified, including directions to area?							
Section 4: Transportation Modes and Routes							
1. Are primary modes and routes of transportation (from the county line to the facility) identified?							
2. Are EHS Supplier's company name, POC info, & phone# identified?							
Section 5: Quadrant Map							
1. Is a Quadrant Map identifying a Vulnerable Zone (VZ) provided?							
2. Is the location of the facility and, if space permits, all special facilities identified on the Quadrant Map?							
3. Is the scale of the Quadrant Map identified?							
4. Is the VZ based on the Worst Credible Release?							
5. Is the radius of the Vulnerable Zone identified on the Quadrant Map?							
6. Is the procedure used to select the radius of the VZ identified?							
7. Is the type and quantity of chemical used to determine the VZ identified?							
8. Is the Quadrant Map divided into four quadrants labeled as A, B, C, D with A in the northeast quadrant with the letters increasing clockwise?							
9. Is the total population for each quadrant listed on the Quadrant Map?							
10. Are the types and quantities of EHS chemicals stored on site the same as last year?							
11. Is the radius of the vulnerable zone the same as last year?							
A. If the radius has changed...							
i. Has a new radius drawing been provided?							
ii. Are changes to affected Special Facilities and associated populations shown on the drawing and/or provided in the Plan?							
3. Are the staging and response points, including alternates, the same as last year?							
A. If a staging and/or response point has changed...							
i. Has a new radius drawing been provided?							
ii. Are changes to affected Special Facilities and associated populations shown on the drawing and/or provided in the Plan?							

**EHS Plan
Checklist KERC
Form 303-PC
Page 1**



"Serving Our Commonwealth"

LEPC - EHS Facility Emergency Response Plan CHECKLIST

FACILITY	Plan #	LEPC		AM		KERC	
		Y	N	Y	N	Y	N
Section 6: Protective Actions							
1. At a minimum, are the protective actions Shelter-In-Place (SIP) and Evacuation of off-site populations discussed?							
2. Are procedures for alerting/warning the public provided?							
3. Are officials who may authorize Exit SIP and reentry of an evacuated area identified?							
Section 7: Emergency Equipment: On Hand / Training / Exercising							
1. Does the plan describe the emergency response equipment available at the facility?							
2. Does the plan describe the emergency response equipment available in the community?							
3. Does the plan describe training level(s) of facility response personnel?							
4. Does the plan describe training level(s) of community response personnel?							
5. Does the plan discuss the facility's exercise program?							
6. Does the plan discuss the community's exercise program?							
7. Does the plan contain a statement of the capability of the area medical facilities to decontaminate and provide care to victims?							
Section 8: Spill Containment/Clean-Up/Disposal							
1. Are procedures provided for containment of released substance?							
2. Are procedures provided for clean-up of released substance?							
3. Does the facility provide released substance disposal procedures?							
4. Does the plan, if required, contain provisions for recycling or the development of an EEC approved disposal plan?							
Section 9: Emergency Notification							
1. Does the plan include procedures to notify ALL organizations identified on the Emergency Notification List Template?							
2. Does the plan include procedures to notify ALL Special Facilities identified within the Vulnerable Zone?							
3. Does the plan include a Special Facility Contact List with facility name, POC info, and phone # for each Special Facility?							
Section 10: GENERAL COMMENTS:							
Section 10: REVIEWED AND APPROVED BY							
Name of County LEPC:		DATE:					
Signature of LEPC Chair:		DATE:					
Signature of KYEM Area Manager:		DATE:					
Signature of KERC Committee Chair:		DATE:					

**EHS Plan
Checklist KERC
Form 303-PC
Page 2**



"Serving Our Commonwealth"



Active Local Emergency Planning Committee Checklist:



1. Identification of Hazards		
YES	NO	a) Our LEPC has identified facilities with extremely hazardous substances.
YES	NO	b) Our LEPC has identified facilities with hazardous chemicals.
YES	NO	c) Our LEPC has identified major transportation routes for extremely hazardous substances.
YES	NO	d) Our LEPC has identified other facilities contributing to or subjected to risk that are in close proximity to those facilities with extremely hazardous substances or hazardous chemicals.
2. Approved EHS Plan within the County Emergency Operations Plan		
YES	NO	a) Our LEPC has included emergency response information for those facilities identified above in our County Emergency Operations Plan.
YES	NO	b) Our LEPC has included emergency response methods and procedures of first responders into our County Emergency Operations Plan.
YES	NO	c) Our LEPC has included emergency response measures used by medical personnel in our County Emergency Operations Plan.
YES	NO	d) Our LEPC has identified emergency equipment available in the community and at the facilities identified above, as well as the persons responsible for them, and has included this information in our County Emergency Operations Plan.
YES	NO	e) Our LEPC has established plans for shelter-in-place or evacuation. It has established early warning systems and has identified emergency shelters. This information has been included in the County Emergency Operations Plan.
YES	NO	f) Our LEPC has identified emergency coordinators within the community and at facilities having extremely hazardous substances that will be responsible for implementing the County Emergency Operations Plan. This information is included in our County Emergency Operations Plan.
3. Implementing the Local Emergency Plan		
YES	NO	a) Our LEPC has established notification procedures by which facility coordinators, identified in 2f, will notify first responders in the event of an extremely hazardous substance emergency.
YES	NO	b) Our LEPC has established notification procedures by which the public will be notified in the event of an extremely hazardous substance emergency.
YES	NO	c) The County Emergency Operations Plan describes the incident command system to be used in responding to hazardous chemical emergencies.

Active LEPC
Checklist KYERC
form 505-AC
page 1



"Serving Our Commonwealth"



Active Local Emergency Planning Committee Checklist:



4. Hazard Analysis		
YES	NO	a) Our LEPC has established a process to identify and record releases of extremely hazardous substances.
YES	NO	b) Our LEPC has established a process to determine the level of risk if extremely hazardous substances are involved in an accident.
YES	NO	c) Our LEPC has established a process to determine the areas and populations that will be affected in the event that extremely hazardous substances are released.
5. Emergency Response Exercises		
YES	NO	a) Our LEPC has developed emergency response drills and exercises to evaluate the effectiveness of our County Emergency Operations Plan.
YES	NO	b) Our LEPC has established a schedule to regularly conduct drills and emergency response exercises.
6. LEPC Organizational Maintenance		
YES	NO	a) Our LEPC regularly schedules, announces, and holds meetings. (Twice a year if EHS present in county)
YES	NO	b) Our LEPC annually reviews, and revises if necessary, facility plans. (Tab Q-7's)
YES	NO	c) Our LEPC regularly conducts exercises and tests emergency procedures.
YES	NO	d) Our LEPC has developed procedures for responding to inquiries concerning extremely hazardous substances in the community.
YES	NO	e) Our LEPC regularly submits documentation required to comply with KyERC grant guidelines.
7. Facility Compliance		
YES	NO	a) Our LEPC actively seeks to increase the number of facilities in our community that must annually report extremely hazardous substances or hazardous chemicals. (TAB Q-7's, Tier2's, & MSDS's)
YES	NO	b) Our LEPC regularly contacts each reporting facility to promote better understanding of EPCRA requirements by the facility owner or operator.
YES	NO	c) Our LEPC provides both basic and detailed EPCRA information to new businesses.
8. Public Awareness		
YES	NO	a) Our LEPC develops articles about EPCRA and prints an annual notice for local news releases.
YES	NO	b) Our LEPC provides public service announcements concerning EPCRA to local radio and television stations.

Active LEPC
Checklist KERC
form 505-AC
page 2



"Serving Our Commonwealth"

Noteworthy Resources

Kentucky Emergency Management

<http://kyem.ky.gov/Who%20We%20Are/Pages/KERC.aspx>

<http://kyem.ky.gov/Who%20We%20Are/Pages/LEPC.aspx>

<http://kyem.ky.gov/programs/Pages/SARATitleIII.aspx>

The following and other relevant items can be found in at least one of the Document Libraries found on the above websites:

- EPCRA: (SARA-TITLE-III)
- KRS 39E
- 106 KAR 1.081 – 1.131
- County Title III Plan Checklist
- Sara Title III Sample Certification Letter
- List of Lists
- EPCRA How to Comply Packet
- Tier2 Reporting Fee Schedule
- Battery Lead-Acid KERC Policy Documents
- Kentucky LEPC's - It Is Your Right To Know
- TAB Q-7 Plan Development Guidance
- Tier2 Retail Gas Station Reporting Rule



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Noteworthy Websites

National Association of SARA Title III Program Officials

<http://www.nasttpo.com/>

EPA - EPCRA information

<http://www2.epa.gov/epcra>

EPA Risk Management Program

<http://www2.epa.gov/rmp>

CAMEO (Computer Aided Management for Emergency Operations)

<http://www2.epa.gov/cameo>

Department of Homeland Security (DHS)

Chemical Facility Anti-Terrorism Standards (CFATS)

<http://www.dhs.gov/chemical-facility-anti-terrorism-standards>



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The Annual LEPC Calendar



~ January 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
1) Tier2 Reporting Period Opens, Facilities must submit to SERC, LEPC, & FD no later than March 1 st 2) No later than <u>January 31</u> publish public information on committee activities entitled "Public (Legal) Notice Advertisement".					1 	2
3	4	5	6	7	8	9
10	11	12	13 	14	15	16
17	18 	19	20	21	22	23
24	25	26	27	28	29	30
	Notes: LEPCs must meet at least twice per year (once if no EHSs in district)					



~ February 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28 Submit photocopy of published "Public Notice"	29	1) No later than <u>February 28</u> submit to the KERC a photocopy of the "Public (Legal) Notice Advertisement" published, clearly showing the name and date of the newspaper.				



~ March 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
Facilities must submit by <u>March 1</u>: 1) Tier2 Reports 2) Facility Annual Certification Letter (FACL)		1 	2	3	4	5
6	7	8	9	10	11	12
13 	14	15	16 	17	18	19
20	21	22	23	24	25 FRIDAY FRIDAY FRIDAY FRIDAY	26
27	28	29	30	31	Notes - FACL must state: 1) there were no changes to EHS Plan; or 2) EHS Plan has been revised and the revisions are included with the FACL	



~ April 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
Notes: No later than April 1st: 1) Review EHS Facility plans and send an ACL to the KYEM AM stating: a. that there were no changes; or b. plan has been revised and the revisions are included with the ACL 2) Submit Grant Application to the KYEM AM 3) Submit documentation of expenditures, including LEPC Bank Ledger					1 Submit: ACL and EHS Plans, Grant App, & Expenditures	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30



~ June 2016 ~




Sun	Mon	Tue	Wed	Thu	Fri	Sat
Notes: No later than <u>June 1</u> submit detailed budget to the KERC or designee, identifying how the funds requested on the Grant Application are to be spent.			1 Submit Detailed Budget	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	Notes:	



~ September 2016 ~






Sun	Mon	Tue	Wed	Thu	Fri	Sat
Notes: No later than <u>September 15</u> the KERC will make the grant awards.				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15 KERC makes Grant Award Payments	16	17
18	19	20	21 	22	23	24
25	26	27	28	29	30	Notes:



~ December 2016 ~



Sun	Mon	Tue	Wed	Thu	Fri	Sat
No later than <u>December 1</u> submit to the KERC: 1) Updated membership list and cover page 2) Bylaws, with certification stating: a. There were no changes; or b. They have been revised and the revisions are included 3) Personal Property Inventory for all items valued > \$500.00				1 Submit: Member list w/ cover page, Bylaws, Property Inventory	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24 
25 	26	27	28	29	30	31 



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Questions?





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Appendix Items List

<input type="checkbox"/> LoL	List of Lists EHSs only, Alphabetical Sort
<input type="checkbox"/> 003-CAL	KERC Calendar of Events
<input type="checkbox"/> 301-PT	EHS Plan Template
<input type="checkbox"/> 302-ACL	Annual Certification Letter
<input type="checkbox"/> 303-PC	EHS Plan Checklist
<input type="checkbox"/> 505-AC	Active LEPC Checklist
<input type="checkbox"/> 507-Acronym	KERC Acronym List
<input type="checkbox"/> 304-EP	Example EHS Plan
	Kentucky County Codes